

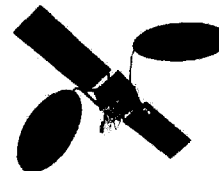


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LIBERTY COMMUNICATIONS

Satellite Division



January 5, 2005

Via Hand Delivery

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

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Federal Communications Commission
Office of Secretary

Re: Mobile Satellite Ventures Subsidiary LLC
Ex Parte Presentation
IB Docket No. 01-185
File No. SAT-MOD-20031118-00333 (ATC application)
File No. SAT-AMD-20031118-00332 (ATC application)
File No. SES-MOD-20031118-01879 (ATC application)

Dear Ms. Dortch:

Liberty Communications of Tallahassee, Florida, hereby urges the Commission to afford L-band Mobile Satellite Service ("MSS") operators greater flexibility in their provision of an Ancillary Terrestrial Component ("ATC"), as requested by Mobile Satellite Ventures LP ("MSV") in the above-captioned proceedings. The increased flexibility requested by MSV will ensure that next-generation MSS systems in the L-band can finally achieve the ubiquitous coverage, capacity, and economies of scale needed for a true consumer service. In contrast, the restrictions on L-band ATC advocated by Inmarsat Ventures plc ("Inmarsat") will only ensure that MSS forever remains a niche service catering to price-insensitive users operating in remote areas.

Liberty has provided MSS since 1996 using the L-band satellites of MSV and Mobile Satellite Ventures (Canada) Inc. Liberty currently provides voice and data services to end user customers throughout the United States. We serve the First Responder market with emphasis on providing critical incident communications to the essential support functions, such as health, transportation, environmental control, agriculture, and law enforcement. We have, in fact, established a statewide emergency back-up communications system that connects local responders to critical state and national agencies. During the recent hurricanes, this system was often the only one that survived the immediate impact from the storms. While the availability of a few operating handsets was laudable, an ATC component would have expanded

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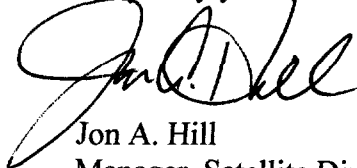
communications to all sectors in dire need - public and private. Ubiquitous coverage, capacity, and instantly available would meet the communications needs of our first response customers.

While Liberty has developed a viable business using current-generation MSS satellites to serve niche markets, we are excited about the future potential for MSS when supplemented with ATC. To date, MSS has been characterized by suitcase-sized user terminals, limited coverage, low data rates, and equipment and service prices far exceeding that offered by terrestrial wireless operators. Because the market for this type of service is small, the economies of scale needed to drive down equipment and service prices have not developed. With ATC, however, MSS has the potential to evolve into a true consumer service. ATC will provide the coverage, capacity, and economies of scale needed to bring MSS equipment and service prices to affordable levels. Moreover, by overcoming satellite signal blockage in urban areas, ATC will allow MSS to become a truly ubiquitous service, allowing service to be provided not only in rural and remote areas but in the most densely populated urban cores as well. Our experience is that man-made and natural disasters don't start or stop at the city limits. Our responders need communications whenever and wherever the situation strikes.

Liberty understands that Inmarsat is opposing MSV's efforts to make MSS into a more attractive service. This is no surprise to Liberty. Inmarsat is only trying to delay the development of competing next-generation systems. Liberty understands that Inmarsat has used concerns of potential interference to oppose and delay MSV's development of a next-generation MSS system. These concerns are overstated and speculative. For example, our customers will continue to use their satellite-only terminals after MSV deploys ATC, but we are not concerned that these terminals will experience interference from MSV's ATC base stations. This is because our customers do not use their satellite-only terminals in areas where MSV is expected to deploy base stations to overcome satellite signal blockage. By definition, if MSV needs to deploy an ATC base station to overcome signal blockage, our satellite-only terminals will not work effectively in those areas. I am certain that our first responders would move to the more ubiquitous MSS/ATC system.

The Commission is at a crossroads in the development of MSS technology. Liberty urges the Commission to follow the path of innovation and better consumer service by adopting MSV's proposals for increased flexibility for ATC in the L-band.

Very truly yours,



Jon A. Hill
Manager, Satellite Division